

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

|                          |   |                            |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA | § |                            |
|                          | § |                            |
| v.                       | § | CRIMINAL NO. 1:23-CR-00183 |
|                          | § |                            |
| WENDINBOUDE OUEDRAOGO    | § |                            |

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE OUT OF TIME**

TO THE HONORABLE CHIEF UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant, through Counsel and requests permission to file additional objections to the PSI, out of time.

Objections to the PSI were due on March 11, 2024. Defense Counsel timely filed his objections only as to the calculation of Criminal history and provided copies to the author of the PSI and the AUSA. However, Defense Counsel failed to route the objections through Local Counsel. The objections were properly file by Local Counsel on March 14, 2024.

In discussing the Guidelines calculations with Government Counsel and Defendant, Defendant now wishes to file two additional objections.

First, with regards to paragraph 43 of the PSI, Defendant objects in that his participation in the instant conspiracy did not involve sophisticated means. Defendant merely filled in a pre-determined number of employees and their salaries to substantiate the amount of fraudulent loans for which applications were made. This was not sophisticated.

Second, with regards to paragraph 44, Defendant objects in that he did not receive more than \$1 million in gross receipts from one or more financial institutions. Defendant received a

total of less than \$400,000 from all financial institutions, so this enhancement should not be applied.

Defense Counsel discussed this motion to request permission to file out of time with Assistant U.S. Attorney Kathleen Robeson, who is unopposed to our request to file out of time.

Accordingly, Defense Counsel very respectfully permission to file his objections out of time.

WHEREFORE, premises considered, the Defendant very respectfully requests that This Honorable Court grant this motion for permission to file the objections out of time.

Very respectfully,

*/S/ Guy L. Womack*

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*/S/ Thomas C. Carter*

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CERTIFICATE OF SERVICE

A copy of the foregoing was delivered via email to Government Counsel and Probation on this 25th day of March, 2024.

*/S/ Guy L. Womack*  
Guy L. Womack

*/S/ Thomas C. Carter*  
Thomas C. Carter